

MARQUIS AURBACH COFFING

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KORY RAZAGHI, an individual,  
ATTENTUS L.L.C., a Nevada Limited-  
Liability Company,

Plaintiffs,

vs.

AHMAD RAZAGHI, an individual;  
MANUEL MORGAN, an individual; and  
RAZAGHI DEVELOPMENT COMPANY,  
LLC, an Arizona Limited-Liability Company;

Defendants.

Case Number:  
2:18-cv-01622-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINES RELATING TO  
THE AHMAD DEFENDANTS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT AND MOTION TO  
DISMISS FOURTH AMENDED  
COMPLAINT (ECF NOS. 156 AND 157)**

**(First Request)**

Pursuant to LR IA 6-1 and LR 7-1, Plaintiffs Kory Razaghi and Attentus L.L.C. (collectively, "Plaintiffs") and Defendants Ahmad Razaghi and Razaghi Development Company, LLC (collectively, the "Ahmad Defendants") (collectively with Plaintiffs, the "Parties") hereby stipulate and agree as follows:

1. On October 21, 2020, Plaintiffs filed a Fourth Amended Complaint [ECF No. 153] following the Court's Order Granting in Part and Denying in Part the Ahmad Defendants' Motion to Dismiss and the Ahmad Defendants' Motion for Partial Summary Judgment [ECF No. 150].

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2. On October 28, 2020, the Parties stipulated to extend the Ahmad Defendants' deadline to respond to the Fourth Amended Complaint to November 18, 2020.
3. On November 18, 2020, the Ahmad Defendants filed a Motion for Partial Summary Judgment and Motion to Dismiss in Part the Fourth Amended Complaint [ECF Nos. 156 and 157] (the "Motion").
4. Pursuant to LR 7-2(b), the current deadline for Plaintiffs to file and serve any points and authorities in response to the Motion is either December 2, 2020 (if considered as a motion to dismiss), or December 9, 2020 (if considered as a motion for summary judgment).

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1           5. The Parties hereby stipulate to extend the time allowed for the Plaintiffs to  
2           file a response to the Motion to December 23, 2020. The Parties further  
3           stipulate to extend the time allowed for the Ahmad Defendants to file a reply  
4           in support of the Motion to January 13, 2021. The reasons for these requests  
5           is to accommodate schedules of counsel for both parties.

7 Dated this 20th day of November, 2020

Dated this 20th day of November, 2020

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ROTHSTEIN DONATELLI LLP

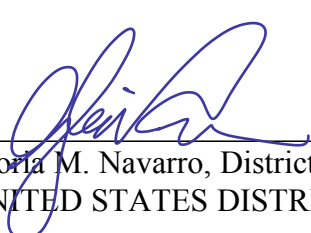
9 By: /s/ Collin M. Jayne  
10 Phillip S. Aurbach, NV Bar No. 1501  
11 Collin M. Jayne, NV Bar No. 13899  
Attorneys for Plaintiffs

By: /s/ Reed C. Bienvenu  
Richard W. Hughes (*pro hac vice*)  
Donna M. Connolly (*pro hac vice*)  
Reed C. Bienvenu (*pro hac vice*)

12 BAILEY❖KENNEDY  
13 Dennis L. Kennedy, NV Bar No. 1462  
14 Paul C. Williams, NV Bar No. 12524  
15 Attorneys for Defendants Ahmad Razaghi and  
16 Razaghi Development Company, LLC

17 IT IS SO ORDERED:

18 DATED this 23 day of November, 2020.

19   
20 \_\_\_\_\_  
21 Gloria M. Navarro, District Judge  
22 UNITED STATES DISTRICT COURT

23 Respectfully Submitted by:

24 MARQUIS AURBACH COFFING

25 /s/ Collin M. Jayne  
26 Phillip S. Aurbach, NV Bar No. 1501.  
27 Collin M. Jayne, NV Bar No. 13899  
Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINES RELATING TO THE AHMAD DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND MOTION TO DISMISS FOURTH AMENDED COMPLAINT (ECF NOS. 156 AND 157) (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 20th day of November, 2020.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch  
An employee of Marquis Aurbach Coffing

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